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*Attorney for Plaintiff and the Proposed Classes*

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

**EDWARD NEWMAN JR.,**  
individually and on behalf of all others  
similarly situated,

*Plaintiffs,*

v.

**FREEDOM FOREVER, LLC,** a  
Delaware limited liability company,

*Defendant.*

No. 5:23-cv-01899-MRA-SHK

**JOINT NOTICE OF  
SETTLEMENT**

JUDGE: Mónica Ramírez  
Almadani

Plaintiff Edward Newman Jr. and Defendant Freedom Forever, LLC hereby  
notify the Court that the parties have reached a resolution to settle this matter in  
principle. The parties anticipate filing a stipulation of dismissal of the action with  
prejudice as to the Plaintiff's individual claim within 30 days. Accordingly, the  
parties respectfully request that all current deadlines and hearings be suspended  
pending the filing of the dismissal stipulation.

1 DATED August 8, 2024

Respectfully submitted,

2 By: /s/ Rachel E. Kaufman

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